

# COHEN & GREEN

August 8, 2025

Hon. Philip M. Halpern, U.S.D.J.  
United States District Court, Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

By Electronic Filing

**Re: Ordonez-Vargas v. Orange County et al., 25-cv-0064**

Your Honor:

My firm, with co-counsel, represents Plaintiff in the case above.

I write to request a one-month extension of time within which to complete service of the initiating papers in this matter on three of the individual defendants: Dominick Piacente, Mandi Zaccagnino, and Joseph Patrick Harkins. All three defendants were employees of Wellpath at the time of this incident. When we attempted service, we learned that they are no longer employed by Wellpath. Counsel for Wellpath provided us with last known addresses. We are in the process of obtaining Amended summonses from the Court for the Amended Complaint. We will promptly attempt service as soon as the Amended summonses issue. Defendant Orange County consents to this request and Defendant Wellpath does not oppose this request.

This would be the fourth extension of time to serve the initiating papers. The first two extensions were required because of the Wellpath bankruptcy proceedings, during which time Plaintiff was barred from acting in this matter. This is the second request for such relief after the end of the Wellpath bankruptcy stay.

Therefore, Plaintiff requests a one-month extension of time within which to complete service on defendants Piacente, Zaccagnino, and Harkins, from August 13, 2025 to September 13, 2025.

Thank you for your attention to this matter.

Respectfully submitted,

/s/

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Elena L. Cohen  
Cohen&Green P.L.L.C.  
*Attorneys for Plaintiff*  
1639 Centre St., Suite 216  
Ridgewood, New York 11385